

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

16 Cr. 207 (KBF)

v.

BORIS NAYFELD

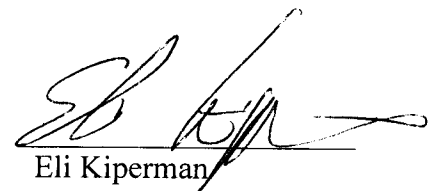
**DECLARATION OF ELI KIPERMAN IN SUPPORT OF DEFENDANT'S
MOTION TO MODIFY CONDITIONS OF SUPERVISED RELEASE**

Eli Kiperman, hereby declares the following, pursuant to 28 U.S.C. §1746:

1. I am the adult son of the Defendant, Boris Nayfeld (“my father”) in the above-captioned matter.
2. I submit this Declaration in support of his Motion to Modify his Conditions of Supervised Release so that he may travel to Russia with me.
3. In Russian culture, caring for the grave of a loved one or family member is extremely important. Indeed, allowing a grave or gravesite to fall into disrepair is an embarrassment and denotes a lack of devotion or respect.
4. It is important for my father to travel to Russia to visit my grandmother’s grave and arrange for its safekeeping. I understand that it was neglected (unbeknownst to my father) because my step-grandfather was using the money that my father sent for alcohol.
5. We have no family or friends left in Russia who could undertake to perform this task.
6. I will be paying for our trip to Russia in the event that the Court allows it. It is an extremely important trip for us to make together.

7. I am close with my father and have seen firsthand his regret over the acts that led to his conviction. As a now 70-year-old man, he has slowed down and refocused on family. He has devoted himself to being a good father and grandfather.
8. My father no longer socializes with or even knows the people he used to socialize with and know. His reputation in the community has been severely harmed as a result of his conviction.

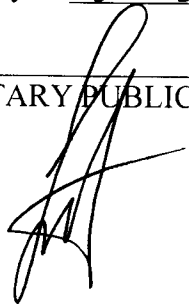
Dated: June 12, 2018
Brooklyn, New York



Eli Kiperman

Sworn to before me this
12 day of June, 2018

NOTARY PUBLIC



NATALIE SOTNIKOVA
Notary Public, State of New York
No. 01SO6081450
Qualified in Kings County
Commission Expires October 7, 2018